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LETTER AND U S NAVY RESPONSE TO U S EPA REGION III COMMENTS TO THIRD
ROUND DRAFT SITE INSPECTION REPORT SITE 7 OLD DUPONT DISPOSAL AREA FISC
WILLIAMSBURG VA
4/27/2012
CH2M HILL

Monica Marrow

From: Stephanie.Sawyer@CH2M.com
Sent: Friday, April 27, 2012 1:15 PM
To: Burchette.John@epamail.epa.gov
Cc: Marlene.Ivester@CH2M.com; scott.park@navy.mil; Wade.Smith@deq.virginia.gov
Subject: RE: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12
Attachments: April 27, 2012 RTCs.docx

John,

Attached are responses to the EPA's third round of comments on the draft CAX Site 7 SI Report, received yesterday, April 26. Since we would really like to wrap up this SI Report and start thinking about the next phase of the investigation (i.e., the RI), if there are any further comments on this Report, I suggest we get together for a conference call because it's starting to seem like we're going in circles with these responses/comments.

In order to facilitate the completion of this SI Report, early next week, I'll be sending out another e-mail that will contain all the files in which edits were made as a result of our responses included in the January 11, 2012 and February 29, 2012 RTCs. If you have any questions or comments, please let me know.

Thanks,
Stephanie

From: John Burchette [mailto:Burchette.John@epamail.epa.gov]
Sent: Thursday, April 26, 2012 9:38 AM
To: Sawyer, Stephanie/VBO
Cc: krista.parra@navy.mil; Ivester, Marlene/VBO; scott.park@navy.mil; Wade.Smith@deq.virginia.gov
Subject: Re: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

Sorry for the delay on these. Just got them back from BTAG yesterday.

John Burchette(3HS11)
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Burchette.john@epa.gov

From: <Stephanie.Sawyer@CH2M.com>
To: John Burchette/R3/USEPA/US, <Wade.Smith@deq.virginia.gov>, <krista.parra@navy.mil>
Cc: <Marlene.Ivester@CH2M.com>, <scott.park@navy.mil>
Date: 02/29/2012 02:42 PM
Subject: Response to EPA Second Round of Comments on the Draft Site 7 SI Report; Sent 2/29/12

To All:

Attached are the Navy's responses to the EPA's second round comments on the Draft Site 7 SI Report. The EPA comments were

received via email on February 1, 2012 (see below). Once we have resolved these comments, we will submit the draft final Site 7 SI Report (red-lined for easy review) for review.

If anyone has any questions regarding these RTCs, please let me know.

Thanks,
Stephanie

From: John Burchette [<mailto:Burchette.John@epamail.epa.gov>]
Sent: Wednesday, February 01, 2012 3:49 PM
To: Sawyer, Stephanie/VBO
Cc: krista.parra@navy.mil; Ivester, Marlene/VBO; Wade.Smith@deq.virginia.gov
Subject: Re: Response to EPA Comments on the Draft Site 7 SI Report; Sent 1/11/12

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From: <Stephanie.Sawyer@CH2M.com>
To: John Burchette/R3/USEPA/US, <Wade.Smith@deq.virginia.gov>, <krista.parra@navy.mil>
Cc: <Marlene.Ivester@CH2M.com>, <Stephanie.Sawyer@CH2M.com>
Date: 01/11/2012 02:18 PM
Subject: Response to EPA Comments on the Draft Site 7 SI Report; Sent 1/11/12

To All:

Attached are the Navy's responses to the EPA's comments on the Draft Site 7 SI Report. The USEPA comments were received via email on November 2, 2011. As indicated by VDEQ in their letter dated November 10, 2011, VDEQ had no comments regarding the Draft SI Report. Once we have resolved these comments, we will submit the draft final Site 7 SI Report (red-lined for easy review) for review.

We will be discussing these RTCs on January 19, 2011, during our Partnering Meeting, however if you have any questions prior to the meeting please let Krista and I know.

Thanks,
Stephanie

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Associate Scientist
CH2M HILL

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***** ATTACHMENT NOT DELIVERED *****

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(866) 411-4EPA (4372). The TDD number is (866) 489-4900.

***** ATTACHMENT NOT DELIVERED *****

[attachment "Response to EPA Comments on draft CAX Site 7 SI 1_11_12.pdf"
deleted by John Burchette/R3/USEPA/US] [attachment "CAX Site 7 RTCs Round
2.pdf" deleted by John Burchette/R3/USEPA/US]

Response to Comments

Draft Site Inspection Report

Site 7

Naval Weapons Station Yorktown Cheatham Annex

Williamsburg, VA

April 27, 2012

EPA Comment #1: *The last part of BTAG Comment 1 stated that Table 3-5 in the decision summary indicates that seven contaminants (endrin, arsenic, lead, manganese, mercury, selenium, and thallium) had concentrations that exceeded background and ecological criteria. The conclusion is that an expanded site inspection (SI) would be completed to confirm selenium and thallium concentrations. BTAG stated that the report needed to explain why concentrations of the other five contaminants listed above do not need to be confirmed in the expanded SI. The response to comments (RTC) does not address this comment.*

Response: According to the ecological risk screening in the SI (and the Step 2b column of Table 3-5), no refined COPCs were identified in soil, and it is concluded that there are no unacceptable ecological risks associated with this medium. However, there was some uncertainty with selenium, so it was carried into the Step 3 column of Table 3-5 as requiring further study. (Note: the reference to “thallium” in Step 3 was for human health, not ecological, risk.) Because of the Team’s recent discussions between Step 2a (COPC identification) and Step 2b (COPC refinement) COPC selection in the SI phase, Step 3 of Table 3-5 and of Section 3.5 have been revised to state: “An RI is recommended to further characterize site related contamination and evaluate potential risk to human health and ecological receptors.” This change allows the SI to conclude and opens up moving forward with the next investigation for Site 7. The Team will work out samples, analytes, data sets, etc. during development of the RI UFP-SAP.

EPA Comment #2: *The response to BTAG Comment 2 indicates Figure 3-1 (Historical Conceptual Site Model) will be revised to show the soil sample locations collected in 2004. Upon further review of this and other figures, the eastern site boundary on the two conceptual site model figures (3-1 and 3-3) do not appear to match up with the eastern site boundaries shown on Figures 3-2, 3-4, 3-5, and 3-6. It would be helpful to show the lobe of waste/debris on the conceptual site model Figure 3-1 on all the other figures with sample locations and site boundaries.*

Response: Figure 3-1 depicts historic, pre-Hurricane Isabel (i.e., pre- September 2003) conditions, while Figures 3-2 to 3-6 depict current conditions after the 2008 removal action. Following the removal action, the “lobe” and surrounding soil is gone, and the site elevation and grade has completely changed. The approximate location of the “lobe” can be added to Figure 3-2 (pre-TCRA conditions); however, it will be an approximate since these are aerial shots of current site conditions. There is really no reason or value added to depict the “lobe” after the removal action; therefore they will not be added to the Groundwater Contour Map (Figure 3-4), Post-Removal Soil Exceedance Results Figure 3-5), and Groundwater Exceedance Results (Figure 3-6).

EPA Comment #3: *The response to BTAG Comment 9 restates the original logic used in the report to eliminate an explosive with no marine surface water screening value. While the original logic is one way to address the issue, it leads to uncertainty. Another approach would be to state there is no marine screening value for nitroglycerin, and while the maximum detected value of this compound is below the freshwater screening value, there is no way to compare it to the marine value for this compound. While*

uncertainty would still exist, the conclusion, it is not reasonable to screen out nitroglycerin, would be reasonable and more conservative.

Response: Comment noted.

EPA Comment #4: BTAG Comment 14 stated that the confirmation sampling results and backfill contaminant concentrations need to be compared to screening values for terrestrial receptors (e.g., plants, invertebrates, birds, and mammals) to ensure that risk is not still present at this site. The RTC states that since the backfill material was certified clean by the removal action contractor, analytical data certifying that the backfill material was clean was not compared to screening criteria or evaluated in the SI. It would be helpful if information were provided indicating how the removal contractor certified that the backfill was clean.

Response: This information is included in Section 2.5 of the Construction Closeout Report (CCR), which states the acceptability of imported materials (i.e., backfill) was verified through laboratory analytical testing; the results are provided in **Appendix C** of the CCR. The CCR and use of the backfill material was reviewed and agreed upon by the Partnering Team.